

## EPA Official Record

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**Notes ID:** 46086277EE593A9B8525753C004B3F72

**From:** KarenD Johnson/R3/USEPA/US

**To:** Francisco Cruz/R3/USEPA/US@EPA

**Copy To:** Elizabeth Ottinger/R3/USEPA/US@EPA, Evelyn MacKnight/R3/USEPA/US@EPA, John Lovell/R3/USEPA/US@EPA, Stephen Field/R3/USEPA/US@EPA

**Delivered Date:** 1/12/2009 8:54:12 AM

**Subject:** Re: FW: Potential New Industry in Reading PA

I would strongly encourage Reading POTW to require the industrial plant to have pre-treatment and removal/recycling of the PFOA from the waste stream. The Washington Works plant in WV and others run by DuPont world-wide have installed carbon filtration to the waste streams, even from old landfills, to remove about 95% of the PFOA. While the Agency doesn't have an Maximum Contaminant Level, nor have they finalized the Risk Assessment under TSCA, the Office of Water last week issued a Health Advisory with values of 0.4 ppb for PFOA and 0.2 ppb for PFOS. We believe these are final, but we're having a call this afternoon with OW and Region 2-5 to confirm the implications of the memo released on January 8.

We have also been working with Region 2 and 4 on their respective PFOA and PFOS issues. The site in Decatur, AL has about 7,000 acres where sludge from the POTW containing FPOS and PFOA have been applied and the concentrations are over 1,000 ppb PFOA, not sure about PFOS, but it is also present, despite the fact that 3M took it off the market in about 2000. Region 2 is also looking at various landfills and POTW discharges in association with DuPont in NJ.

**Francisco Cruz/R3/USEPA/US**

01/09/2009 12:50 PM

To  
cc  
Subject

Evelyn MacKnight/R3/USEPA/US@EPA, John Lovell/R3/USEPA/US@EPA  
Elizabeth Ottinger/R3/USEPA/US@EPA, KarenD Johnson/R3/USEPA/US@EPA  
Re: FW: Potential New Industry in Reading PA

The following site contains information about PFOA.

<http://www.epa.gov/oppt/pfoa/pubs/pfoainfo.htm>

Francisco Cruz, P.E.  
Environmental Engineer  
NPDES Permits Branch (3WP41)  
Office of Permits and Enforcement  
Tel.: 215/814-5734  
Fax: 215/814-2302

**Evelyn  
MacKnight/R3/USEPA/US**

01/09/2009 11:48 AM

To  
cc  
Subject

John Lovell/R3/USEPA/US@EPA  
Elizabeth Ottinger/R3/USEPA/US@EPA, KarenD Johnson/R3/USEPA/US@EPA, Francisco Cruz/R3/USEPA/US@EPA

Re: FW: Potential New Industry in Reading PA

Karen Johnson has been heavily involved in the DuPont/PFOA issue and I think that it has come up in Francisco's permit reviews as well.

**John Lovell/R3/USEPA/US**

01/09/2009 08:37 AM

To <deborah.hoag@readingpa.org>  
cc Evelyn MacKnight/R3/USEPA/US@EPA, Elizabeth Ottinger/R3/USEPA/US@EPA  
Subject Re: FW: Potential New Industry in Reading PA

I don't know a lot about PFOA, but I do know that it is one of those emerging contaminant pollutants. There is a case down in Alabama where PFOA (and PFOS) appear to have gotten into beef cattle through land application of municipal sludge. I recently received an article from HQ about it and I'll forward that to you. I've also heard about a case in Ohio where there has been contamination of drinking water wells (I'm not sure if that is PFOS or PFOA or both). We had a conference call yesterday with HQ and the regions and the issue was discussed. I'm not sure that there is a lot of info about what levels are harmful, but from what I've heard, these chemicals are banned in Europe but are apparently used in a bunch of applications in the US including chrome plating and for stain resistance/ water repellent in fabrics. There are apparently some states that are moving to regulate these compounds, but I haven't heard that PA is one of them. The bottom line is that I don't have a lot of specific information for you, but my tendency is to say that if the company can eliminate it, that would be the best approach.

John Lovell  
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**<deborah.hoag@readingpa.org>**

12/30/2008 10:42 AM

To John Lovell/R3/USEPA/US@EPA  
cc  
Subject FW: Potential New Industry in Reading PA

John,

Please read the below email. I didn't want you to be able to provide comments that were not taken as representing EPA as a whole or risk their being applied to another region not knowing how this issue is being handled. I have questions about the EPA position regarding the constituent discussed below particularly since it was mentioned. As we are progressing with the WWTP design, I am asking the gurus at B&V for their input so I feel somewhat certain there is not an adverse impact that way. I appreciate any insights you can provide as well. Thanks a bunch!

Deb

Deborah A.S. Hoag, P.E.  
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-----Original Message-----

**From:** Deborah A. Hoag  
**Sent:** Tuesday, December 30, 2008 10:22 AM  
**To:** 'Scanlan, Patricia'; 'huntergl@bv.com'; 'Kobylinski, Edmund A. (Ed)'  
**Cc:** 'Hydro, Stephen K.'  
**Subject:** Potential New Industry in Reading PA

Gary, Ed, and Trish,

We have some active organizations working to pursue economic development in the Reading and Berks County area. Many times, I am contacted due to the potential wastewater impacts – volume, financial, or constituents. I received an inquiry this morning from a group working with a firm that is coming for additional visits to the former AT&T manufacturing facility. The facility was sold and part of it is currently used as the Expo Center which has little impact on wastewater especially compared to the prior use. I am not familiar with the parameter they are discussing and am concerned about the impact on the treatment process, receiving stream if it passes through unchanged, or the biosolids quality if it accumulates there.

The potential firm is a manufacturer of solar cell components. In advance of their return trip, they wanted to raise a potential issue with obtaining a wastewater discharge permit because of a fluorosurfactant currently used in an etching process - Zonyl FSO-100, manufactured by DuPont. I have included portions of the email they originally sent to the site marketing organization.

*It has recently come to our attention that Perfluoroactanoic Acid (PFOA), a precursor of FSO-100, has been the subject of numerous studies linking low level exposure to PFOA and increased risk of cancer in animals. In 2006, DuPont and the U.S. Environmental Protection Agency entered into a voluntary Stewardship Program to significantly reduce emissions of PFOA by 2010 and completely eliminate the manufacture, purchase, or use by 2015. As part of this program, DuPont will replace the Zonyl product line with the Capstone line by 2010. Even though PFOA and its derivatives and precursors are not specifically regulated by the EPA, some state and local regulatory jurisdictions have PFOA on their radar. Regulations may follow or already exist. As part of our due diligence in evaluating the [ ] site, we would like to understand any possible issues, if any, with obtaining a wastewater discharge permit in the event we are unable to find a substitute for FSO-100 before startup of our process tools. We thought we should raise this issue now, so that we could have this discussion with the environmental permitting authority when our team is on site.*

In addition, they have also requested their supplier to find a replacement for FSO-100 before startup of their process tools. However, they are not aware of any replacement that would eliminate PFOA from the waste stream.

I would appreciate any input and guidance you may have with this parameter and the potential impacts. I want to be fair to the potential industry while not jeopardizing the treatment plant. I have copied all of you as I am not certain of your schedules with the holidays and the desire to get some information prior to meeting with the industry in the next few weeks. Thanks in advance for your assistance.

Deb

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